



U.S. Department of Justice

*United States Attorney  
Eastern District of New York*

DCP:JPM/GMM  
F. #2012R02196

271 Cadman Plaza East  
Brooklyn, New York 11201

September 6, 2019

By ECF

The Honorable Nicholas G. Garaufis  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. OZ Africa Management GP, LLC  
Criminal Docket No. 16-515 (NGG)

Dear Judge Garaufis:

The government, along with the former shareholders of Africo Resources Ltd. (the "Claimants"), and the defendant OZ Africa Management GP, LLC ("OZ Africa" or the "defendant"), respectfully submit this letter in response to the Court's order in the above-referenced case to submit a briefing schedule regarding the calculation of the appropriate restitution amount for the Claimants. The parties have conferred and jointly agree on the following proposed briefing schedule for the Court's consideration:

- Claimants and the government will file opening submissions by October 28, 2019.
- The defendant to file responsive pleading by December 4, 2019.
- Claimants and the government to file reply by December 20, 2019.
- The defendant reserves the right to seek a sur-reply if appropriate.
- The defendant believes it may need discovery. Claimants and the government take no position at this time concerning any such discovery as the parties have not had an opportunity to discuss the defendant's requests. Claimants and the government will confer with the defendant regarding such discovery, and if they cannot agree, the defendant will request discovery from the Court by September 20, 2019. The defendant shall request or apply to the Court for any discovery required as a result of the Claimants' or government's submissions by November 4, 2019.

- Any party may make application to the Court to have the above dates extended upon a showing of sufficient need, including if necessary to obtain and review discovery that has been ordered by the Court.
- The parties respectfully request oral argument, and reserve their right to request a hearing on any disputed facts, which is jointly submitted to the Court for its consideration:

The parties respectfully request that the Court adopt the foregoing schedule.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ David C. Pitluck

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By: /s/ Gerald M. Moody

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cc: Clerk of the Court (NGG) (by ECF)  
All Counsel of Record (by ECF)

**Application granted.**

**So Ordered.** *h h h*  
s/Nicholas G. Garaufis

**Hon. Nicholas G. Garaufis**

**Date:** *9/9/19*